

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Telecommunications Relay Services)	CG Docket No. 03-123
and Speech-to-Speech Services for)	
Individuals with Hearing and Speech Disabilities)	
)	
E911 Requirements for IP-Enabled Service)	WC Docket No. 05-196
Providers)	

To: The Chief, Consumer and Governmental Affairs Bureau, and Chief, Wireline Competition Bureau

MINIMUM STANDARDS WAIVER REPORT

Convo Communications, LLC (“Convo”) submits this report in accordance with the Commission’s directive that providers of video relay services (“VRS”) and IP Relay Service (“IP Relay”) detail their progress towards meeting certain waived minimum standards.¹ On June 22, 2012, the Commission, through the Acting Chief of the Consumer and Governmental Affairs Bureau (“CGB”) and the Chief of the Wireline Competition Bureau (“WCB”), extended waivers of certain mandatory minimum standards until July 1, 2013.² The extension was conditioned upon VRS and IP Relay providers filing a status report by April 16, 2012 detailing the progress made by providers in complying with the requirement to provide the following services: (1) one-line Voice Carry Over (“VCO”), VCO-to-TTY, and VCO-to-VCO; (2) one-line Hearing Carry Over (“HCO”), HCO-to-TTY, and HCO-to-HCO; (3) call release; (4) pay-per-call (900) calls;

¹ See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CG Docket No. 03-123, WC Docket No. 05-196, DA 12-988 ¶ 1 (CGB/WCB 2012) (“2012 Waiver Order”).

² *Id.*

(5) types of calls available to hearing users; (6) equal access to interexchange carriers; and (7) Speech-to-Speech (STS).³ As detailed below, Convo is working toward complying with the waived requirements and continues to focus on improving its VRS products to further enhance service quality and functionality.

I. ONE-LINE VCO, VCO-TO-TTY, AND VCO-TO-VCO

Convo currently provides two-line VCO service, as required by the Commission.⁴ In addition, Convo now provides one-line VCO service for its SIP-based products. At this time, however, Convo does not have a feasible one-line VCO solution for its non-SIP based products. For example, Convo is unable to support one-line VCO for third-party videophones that do not have microphones or another mechanism for inputting audio, such as the Sorenson VP-100 or 200. Therefore, Convo requests that the Commission continue to waive this requirement for non-SIP based products.

II. ONE-LINE HCO, HCO-TO-TTY, AND HCO-TO-HCO

Convo currently provides two-line HCO service, as required by the Commission.⁵ In addition, Convo now provides one-line HCO service for its SIP-based products. At this time, however, Convo does not have a feasible one-line HCO solution for its non-SIP based products. Similar to one-line VCO, Convo requests that the Commission continue to waive this requirement for non-SIP based products.

³ *Id.*

⁴ 47 C.F.R. § 64.604(a)(3)(v).

⁵ *Id.*

III. CALL RELEASE

Call release functionality allows a communications assistant (“CA”) to sign-off from a call between two TTY users.⁶ This functionality is inapplicable in the VRS context. VRS users can communicate directly with each other by making point-to-point calls utilizing their assigned ten-digit numbers. There is, therefore, no need for CAs to participate in calls between VRS users, which eliminates the need for “call release” functionality. Accordingly, Convo requests that this waiver be extended permanently.

IV. PAY-PER-CALL (900) CALLS; TYPES OF CALLS

The Commission requires that TRS providers handle “any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so.”⁷ Convo has been, and remains, unable to process calls that require its users to be billed for the service, such as operator-assisted calls, 900-number calls, and long-distance calls. Convo has no method by which to pass through to its customers the charges associated with 900-number calls and operator-assisted calls, and therefore Convo does not currently process such calls. However, Convo currently processes long-distance calls free of charge to its users. In the case of certain high-cost international calls, Convo requires the VRS user to make the call as a collect (or reverse charge) call or to use a calling card. Accordingly, Convo requests that the Commission continue to waive this minimum standard for VRS.

V. EQUAL ACCESS TO INTEREXCHANGE CARRIERS

The Commission requires that TRS users have the ability to access their chosen interexchange carrier (“IXC”) through TRS to the same extent that such access is provided to

⁶ 2011 Waiver Order ¶ 12.

⁷ 47 C.F.R. § 64.604(a)(3)(ii).

voice users.⁸ At this time, it is technically infeasible to provide users with their choice of IXC, and such choice would provide little, if any, benefit to VRS users because long-distance service uniformly is provided by VRS companies without charge. Moreover, it would be impractical and inefficient to require each VRS provider to establish a relationship with each and every possible IXC that a user might choose. Accordingly, Convo requests that the Commission to permanently extend this waiver.

VI. SPEECH-TO-SPEECH

Convo supports the Commission's continued indefinite waiver of the speech-to-speech ("STS") service requirement for VRS.⁹ VRS users overwhelmingly use American Sign Language to communicate, and those customers who prefer to use VCO services are able to do so. Convo has not been asked by any VRS user to provide this service and does not believe that STS services would benefit VRS users.

⁸ *Id.* § 64.604(b)(3).

⁹ *See, e.g., 2011 Waiver Order* ¶ 20.

VII. CONCLUSION

For the foregoing reasons, the Commission should extend the waivers as discussed above.

Respectfully submitted,

CONVO COMMUNICATIONS, LLC

By: /s/ David J. Bahar

David J. Bahar
Vice President of Government and
Regulatory Affairs

Convo Communications, LLC
6601 Owens Drive, Suite 155
Pleasanton, CA 94588
(925) 452-4745

April 16, 2013